

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

IN RE ENVISION HEALTHCARE CORP.

This Document Relates to: ALL ACTIONS

Case No. 1:18-cv-01068-RGA-SRF

CLASS ACTION

CONSOLIDATED STOCKHOLDER  
LITIGATION

**LEAD PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF THE  
SETTLEMENT, CERTIFICATION OF THE SETTLEMENT CLASS, AND APPROVAL  
OF THE NOTICE TO THE CLASS**

**MONTEVERDE & ASSOCIATES PC**

Juan E. Monteverde  
Miles D. Schreiner  
The Empire State Building  
350 Fifth Avenue, Suite 4405  
New York, NY 10118  
Tel.: (212) 971-1341

*Lead Counsel for Lead Plaintiff*

**COOCH AND TAYLOR, P.A.**

Blake A. Bennett (#5133)  
The Nemours Building  
1007 N. Orange St., Suite 1120  
Wilmington, DE 19801  
Tel.: (302) 984-3800

*Delaware Counsel for Lead Plaintiff*

Dated: October 15, 2020

Pursuant to Federal Rules of Civil Procedure 23(a), 23(b)(3), and 23(e), Lead Plaintiff Jon Barrett (“Lead Plaintiff”) respectfully moves this Court for an order: (1) preliminarily approving the terms of the proposed Settlement as set forth in the Stipulation; (2) conditionally certifying the Settlement Class for purposes of providing notice; (3) approving the form and method for providing notice of the proposed Settlement and Final Approval Hearing to the Settlement Class; and (4) scheduling the Final Approval Hearing at which the Court will consider the request for final approval of: (a) the proposed Settlement, (b) final certification of the Settlement Class, Lead Plaintiff, and Lead Counsel, (c) the proposed Plan of Allocation, and (d) Lead Counsel’s application for an award of attorneys’ fees and expenses, including any award to Lead Plaintiff for his representation of the Settlement Class.

In support of this Motion, Lead Plaintiff submits herewith the accompanying Brief.

Dated: October 15, 2020

Respectfully submitted,

**MONTEVERDE & ASSOCIATES PC**

Juan E. Monteverde  
Miles D. Schreiner  
The Empire State Building  
350 Fifth Avenue, Suite 4405  
New York, NY 10118  
Tel.: (212) 971-1341  
Fax: (212) 202-7880  
Email: jmonteverde@monteverdelaw.com  
mschreiner@monteverdelaw.com

**COOCH AND TAYLOR, P.A.**

/s/ Blake A. Bennett

Blake A. Bennett (#5133)  
The Nemours Building  
1007 N. Orange St., Suite 1120  
Wilmington, DE 19801  
Tel.: (302) 984-3800

*Delaware Counsel for Lead Plaintiff*

*Lead Counsel for Lead Plaintiff*